

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

*Civil Case No.*

SARAH MCGEE KRENN,

Defendant.

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COMPLAINT

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NOW COMES the plaintiff, United States of America, by and through its attorneys, Steven M. Biskupic, United States Attorney for the Eastern District of Wisconsin, and Nora S. Barry, Assistant United States Attorney for the Eastern District of Wisconsin, and hereby states as its civil complaint against the defendant, Sarah McGee Krenn , as follows:

1. The United States District Court for the Eastern District of Wisconsin has jurisdiction over the subject matter of this civil action pursuant to Title 28, United States Code, Section 1345. Venue is proper pursuant to Title 28, United States Code, Section 1391.

2. The plaintiff, United States of America, is a sovereign body responsible for the conduct and operation of government. Through the Office of the United

States Attorney for the Eastern District of Wisconsin, United States Department of Justice, the United States is responsible for the enforcement and collection of debts due and owing to the agencies, offices, and units of the United States of America.

3. Upon information and belief, the defendant, Sarah McGee Krenn , is an adult individual residing at 150 E. Dekora Street, Apt # 205, Saukville, Wisconsin 53080, in the State and Eastern District of Wisconsin. As set forth in this complaint, the defendant is presently indebted to the plaintiff.

4. As described in the **Certificate of Indebtedness** attached to this **Complaint** as Exhibit A, the defendant owes the plaintiff the principal monetary sum of \$10,567.73 plus interest and penalty charges.

5. To date, the defendant has not paid the indebtedness to the plaintiff in full, although the plaintiff has made demand for payment.

WHEREFORE, the plaintiff, United States of America, hereby requests that the Court enter a civil judgment against the defendant in these amounts: \$10,165.06 in principal; \$363.42 in total penalty charges; and \$39.25 in interest accrued through October 14, 2003, additional interest accruing thereafter and to the date of the entry of judgment at the annual rate of 4.27%; additional interest accruing at the legal rate from the date of the entry of judgment until the indebtedness is paid in full.

The plaintiff, United States of America, further requests that the Court award

it those reasonable costs and expenses incurred in the litigation of this action;  
along with such other legal and equitable relief as it deems appropriate.

Respectfully submitted at Milwaukee, Wisconsin this \_\_\_\_\_ day of  
December, 2003.

STEVEN M. BISKUPIC  
United States Attorney

By:

NORA S. BARRY  
Assistant United States Attorney

Office of the United States Attorney  
Eastern District of Wisconsin  
530 Federal Courthouse  
517 East Wisconsin Avenue  
Milwaukee, Wisconsin 53202-4580  
Telephone No.: (414) 297-1700  
Facsimile No.: (414) 297-1713

## CONFIDENTIAL CONFLICT OF INTEREST CERTIFICATION

In re: Sarah McGee Krenn

Case No. \_\_\_\_\_

The undersigned hereby certify that to the best of their knowledge, neither they nor their spouse, dependent child, general partner, or any organization for which they are serving as an officer, director, trustee, general partner or employee, or any person or organization with whom they are negotiating or have an arrangement concerning prospective employment has a financial interest in this matter. A financial interest includes any current or contingent ownership, equity, or security interest in real or personal property of a business, and may include an indebtedness or compensated employment relationship.

They further certify to the best of their knowledge that this matter will not affect the financial interests of any member of their household. Also, to the best of their knowledge, no member of their household; no relative with whom they have a close relationship; no one with whom their spouse, parent or dependent child has or seeks employment; and no organization with which they are seeking a business relationship nor which they now serve actively or have served within the last year are parties or represent a party to the matter.

So long as they are involved in this matter, they acknowledge their responsibility to disclose the acquisition of any financial or personal interest as described above that would be affected by the matter, and to disclose any interest they, or anyone noted above, has in any person or organization that does become involved in, or is affected at a later date by, the conduct of this matter.

_____	December 8, 2003
Signature	Date

_____	_____
Signature	Date

_____	_____
Signature	Date

_____	_____
Signature	Date

### **Privacy Act Statement**

Title I of the Ethics in Government Act of 1978 (5 U.S.C. App.), Executive Order 12674 and 5 CFR Part 2634, Subpart I require the reporting of this information. The primary use of the information on this form is for review by officials of the Justice Department to determine compliance with applicable federal conflict of interest laws and regulations. Additional disclosures of the information on this report may be made: (1) to a federal, state or local law enforcement agency if the Justice Department becomes aware of a violation or potential violation of law or regulations; (2) to a court or party in a court or federal administrative proceeding if the government is a party or in order to comply with a judge-issued subpoena; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or decision; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; and (6) in response to a request for discovery or for the appearance of a witness in a judicial proceeding if the information is relevant to the subject

matter. This confidential certification will not be disclosed to any requesting person unless authorized by law. See also the OGE/GOVT-2 executive branchwide Privacy Act system of records.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

Case Number:

v.

SARAH MCGEE KRENN,

Defendant.

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**NOTICE OF LAWSUIT AND REQUEST FOR WAIVER OF SERVICE OF SUMMONS**

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**TO:** Sarah McGee Krenn

The enclosed complaint is served upon you pursuant to Rule 4(d) of the Federal Rules of Civil Procedure.

A lawsuit has been commenced against you (or the entity on whose behalf you are addressed). A copy of the complaint is attached to this notice. It has been filed in the United States District Court for the Eastern District of Wisconsin and has been assigned docket number \_\_\_\_\_.

This is not a formal summons or notification from the court but rather a request that you return this waiver of service in order to save the costs of serving you with a judicial summons and an additional copy of the complaint. The cost of service will be avoided if I receive a signed copy of this waiver within 30 days after the date designated below as the date on which this Notice and Request for Waiver of Service of Summons is filed. Please enclose a stamped, self-addressed envelope for your use. An extra copy of the waiver is also being sent to your records.

If you comply with this request and return the signed waiver, it will be filed with the court. The summons will be served upon you. The action will then proceed as if you had been served on the date the waiver is filed, except that you will not be obliged to answer the complaint before 60 days from the date designated below as the date on which this notice is sent (or before 90 days from that date if the court is not in any judicial district of the United States).

If you do not return the signed waiver within the time indicated, I will take appropriate steps to effect formal service in a manner authorized by the Federal Rules of Civil Procedure and will, to the extent authorized by those rules, ask the court to require you (or the party on whose behalf you are addressed) to pay the full costs of such service. In that connection, please read the statement of the duty of parties to waive the service of the summons, which is set forth at the bottom of this form.

I affirm that this request is being sent to you on behalf of the plaintiff, this \_\_\_\_\_ day of \_\_\_\_\_, December, 2003.

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NORA S. BARRY  
Assistant United States Attorney

TO: Nora S. Barry, Assistant United States Attorney  
530 Federal Courthouse, 517 East Wisconsin Avenue, Milwaukee, WI 53202-4580

I acknowledge receipt of your request that I waive service of a summons in the action of States v. Sarah McGee Krenn, Case No. \_\_\_\_\_, in the States District Court for the Eastern District of Wisconsin. I have also received a copy of the complaint, two copies of this instrument, and a means by which I can return the signed waiver to me.

I agree to save the cost of service of a summons and an additional copy of the complaint by not requiring that I (or the entity on whose behalf I am acting) be served with judicial process provided by Rule 4.

I (or the entity on whose behalf I am acting) will retain all defenses or objections to the jurisdiction or venue of the court except for objections based on a defect in the summons or in the summons.

I understand that a judgment may be entered against me (or the party on whose behalf I am acting) if an answer or motion under Rule 12 is not served upon you within 60 days after \_\_\_\_\_ or 90 days after that date if the request was sent outside the United States.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature  
Sarah McGee Krenn , Defendant

\_\_\_\_\_  
Address

\_\_\_\_\_  
City, State and Zip Code

#### DUTY TO AVOID UNNECESSARY COSTS OF SERVICE OF SUMMONS

Rule 4 of the Federal Rules of Civil Procedure requires certain parties to cooperate in saving the costs of service of the summons and complaint. A defendant located in the United States who is notified of an action and asked by a plaintiff located in the United States to waive service of a summons and fails to do so will be required to bear the cost of such service unless good cause be shown for the failure to sign and return the waiver.

It is not good cause for a failure to waive service that a party believes that the complaint is untrue or that the action has been brought in an improper place or in a court that lacks jurisdiction over the subject matter of the action or over its person or property. A party who waives service of the summons and defenses and objections (except any relating to the summons or to the service of the summons) may not later object to the jurisdiction of the court or to the place where the action has been brought.

A defendant who waives service must, within the time specified on the waiver form, serve on its attorney a response to the complaint and must also file a signed copy of the response with the court. If an answer or motion is not served within this time, a default judgment may be taken against that party. By waiving service, a defendant is allowed more time to answer than if the summons had been served when the request for waiver was received.

<b>I (a) PLAINTIFFS</b>  UNITED STATES OF AMERICA	<b>DEFENDANTS</b>  SARAH MCGEE KRENN
<b>(b)</b> COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF (EXCEPT IN U.S. PLAINTIFF CASES)	COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT (IN U.S. PLAINTIFF CASES ONLY)  Milwaukee
<b>(c)</b> ATTORNEYS (414) 297-1700 Nora S. Barry, AUSA Assistant U.S. Attorney Room 530; 517 East Wisconsin Avenue Milwaukee, WI 53202-4580	ATTORNEYS (IF KNOWN)
<b>II. BASIS OF JURISDICTION</b>  <input checked="" type="checkbox"/> <b>1 U.S. Government Plaintiff</b>  <input type="checkbox"/> <b>2 U.S. Government Defendant</b>  <input type="checkbox"/> <b>3 Federal Question</b> (U.S. Government Not a Party)  <input type="checkbox"/> <b>4 Diversity</b> (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (For Diversity Cases Only)  PTF DEF <b>Citizen of This State</b> <input type="checkbox"/> 1 <input type="checkbox"/> 1 <b>Incorporated or Principal Place of Business in This State</b> <input type="checkbox"/> 4 <input type="checkbox"/> 4 <b>Citizen of Another State</b> <input type="checkbox"/> 2 <input type="checkbox"/> 2 <b>Incorporated and Principal Place of Business in Another Place</b> <input type="checkbox"/> 5 <input type="checkbox"/> 5 <b>Citizen or Subject of a Foreign Country</b> <input type="checkbox"/> 3 <input type="checkbox"/> 3 <b>Foreign Nation</b> <input type="checkbox"/> 6 <input type="checkbox"/> 6

**IV. CAUSE OF ACTION** (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Repayment of Army Reserve Officer Training Corps (AROTC) Scholarship Service Agreement.

<b>V. NATURE OF SUIT</b>				
<b>CONTRACT</b>  <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input checked="" type="checkbox"/> 152 Recovery of Defaulted Student Loans (excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>TORTS</b>  <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury  <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Person injury -- Med Malpractice <input type="checkbox"/> 365 Personal Injury -- Product Liability <input type="checkbox"/> 368 Asbestos <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Injury <input type="checkbox"/> 385 Property Damage Product Liability  <b>CIVIL RIGHTS PETITIONS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ <input type="checkbox"/> 530 General Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights  <b>PRISONER</b> <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus <input type="checkbox"/> 550 Other	<b>FORFEITURE/PENALTY</b>  <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property <input type="checkbox"/> 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 RR & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other  <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt Relations <input type="checkbox"/> 730 Labor/Mgmt Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>BANKRUPTCY</b>  <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung(923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))  <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<b>OTHER STATUTES</b>  <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 RICO <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions

<b>VI. ORIGIN</b> <input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify) <input type="checkbox"/> 6 Multidistrict Litigation <input type="checkbox"/> 7 Judge from Magistrate Judgment	Appeal to District
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<b>VII. REQUESTED IN COMPLAINT</b> <input type="checkbox"/> UNDER F.R.C.P. 23	CHECK IF THIS IS A <b>CLASS ACTION</b>	<b>DEMAND \$</b>	Check YES only if demanded in complaint <b>JURY DEMAND:</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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<b>VIII. RELATED CASES IF ANY</b>	Judge _____ Docket Number _____
DATE _____	SIGNATURE OF ATTORNEY OF RECORD _____
UNITED STATES DISTRICT COURT	NORA S. BARRY, ASSISTANT U.S. ATTORNEY